### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Behalf of All Others Similarly Situated,	) )
Plaintiff,	, )
Tallita,	) Case No. 2:16-cv-06051-ER
v.	) )
CHEMTURA CORPORATION, CRAIG A.	)
ROGERSON, JEFFREY D. BENJAMIN, TIMOTHY J. BERNLOHR, ANNA C.	) )
CATALANO, JAMES W. CROWNOVER, ROBERT A. DOVER, JONATHAN F.	)
FOSTER, JOHN K. WULFF, LANXESS	)
DEUTSCHLAND GMBH, and LANXESS ADDITIVES INC.,	)
,	ĺ
Defendants.	)

# AMENDED STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULE FOR PLAINTIFF'S COUNSEL'S APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

WHEREAS, on February 17, 2017, the Court entered a Stipulation and Order Dismissing Action With Prejudice as to Plaintiff Only and Retaining Jurisdiction to Determine Plaintiff's Counsel's Application for an Award of Attorneys' Fees and Reimbursement of Expenses (the "Fee and Expense Application"); and

WHEREAS, the parties have conferred regarding the schedule governing the Fee and Expense Application;

IT IS HEREBY STIPULATED AND AGREED, by the parties hereto, through their undersigned counsel, subject to the approval of the Court, that the following schedule shall govern the briefing on the Fee and Expense Application:

Plaintiff shall file and serve his Opening Brief in support of the Fee and Expense
 Application and any supporting papers by March 14, 2017.

- 2. Defendants shall file and serve any opposition to the Fee and Expense Application and any supporting papers by April 11, 2017.
- 3. Plaintiff shall file and serve his Reply Brief in further support of the Fee and Expense Application and any supporting papers by April 25, 2017.
- 4. Following completion of briefing, the parties shall contact the Court to schedule argument regarding the Fee and Expense Application at a time convenient to the Court.

Dated: March 7, 2017

#### RM LAW, P.C.

#### **OF COUNSEL:**

#### RIGRODSKY & LONG, P.A.

Brian D. Long (PA Bar No. 82370) Gina M. Serra (PA Bar No. 308207) 2 Righter Parkway, Suite 120 Wilmington, DE 19803 (302) 295-5310 By: /s/ Richard A. Maniskas

Richard A. Maniskas (PA Bar No. 85942) 1055 Westlakes Drive, Suite 3112 Berwyn, PA 19312 (484) 324-6800

Attorneys for Plaintiff Louis Scarantino

#### DAVIS POLK & WARDWELL LLP

By: /s/Lawrence Portnoy

Lawrence Portnoy 450 Lexington Avenue New York, NY 10017 (212) 450-4874

Attorneys for Defendants Chemtura Corporation, Craig A. Rogerson, Jeffrey D. Benjamin, Timothy J. Bernlohr, Anna C. Catalano, James W. Crownover, Robert A. Dover, Jonathan F. Foster, and John K. Wulff

## SKADDEN ARPS SLATE MEAGHER & FLOM LLP

By: /s/ Susan L. Saltzstein

Susan L. Saltzstein Four Times Square New York, NY 10036 (212) 735-3000

Attorneys for Defendant Lanxess Additives Inc.

IT IS SO ORDERED.

Dated: 3/7//7, 2017

United States District Judge